REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application.

Applicant has canceled Group II claims 45-54 and 84-86, without prejudice.

35 U.S.C. § 102

Claims 1-44 and 55-83 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,599,194 to Smith et al. (hereinafter "Smith"). Applicant respectfully submits that claims 1-44 and 55-83 are not anticipated by Smith.

Smith discloses:

> An existing video game system is modified to include additional communication and storage capability via a modem and hard disk drive. The modification may involve the use of an expansion device coupled to a video game system port. A cable TV tuner is also included in the expansion device to assist in providing a unique picture-in-picture video capability. TV signals are coupled to the expansion device via the RF input from either cable TV or off-air signals. These RF signals are blended with the output signals from the video game system. A user may, for example, watch TV while viewing overlay information from the video game console. A user may receive a TV channel guide downloaded via the Internet, spot a program which the user desires to view and immediately access, via an IR input, the desired channel through the expansion device TV tuner. A user may also watch TV while simultaneously logging onto the Internet. A hard drive permits downloading from the Internet of entire games.
> Smith Abstract.

The game system enhancement described in Smith does not disclose the elements of the claims in the present application.

Claim 1 of the present application, as amended, recites:

> A game console, comprising:
> a memory;
> a processor coupled to the memory; and
> a console application stored in the memory and executable on the processor, the console application presenting a user interface to facilitate access to multiple different media types, wherein each of the multiple different media types has an associated graphical element in the user interface.

Although Smith mentions a user interface, Smith fails to disclose "a user interface to facilitate access to multiple different media types, wherein each of the multiple different media types has an associated graphical element in the user interface", as recited in claim 1.

The Office Action cites several portions of Smith as support for the user interface recited in claim 1. In particular, the Office Action cites "Figure 4, Column 1, lines 17-18, Column 2, lines 34-38, Column 3, lines 40-46, and 54-67, and Columns 22, 23, 25, lines 3-22." See last sentence of paragraph number 2 (page 4 of Office Action). Each of these cited portions of Smith are discussed below. With respect to Figure 4, a block diagram of the expansion device is illustrated. However, Figure 4 of Smith fails to disclose a user interface.

Regarding Column 1, lines 17-18, that portion of Smith discusses downloading various data to the system's hard disk, but fails to discuss any details of a user interface. Column 2, lines 34-38 of Smith discusses storing data, such as

games, to the mass storage disk. This portion of the Smith reference does not disclose any information regarding a user interface. Regarding Column 3, lines 40-46, that portion of Smith discusses packaging the enhancements into a single unit, but does not mention a user interface. Column 3, lines 54-67 of Smith discuss the functionality of expansion device 95, but fails to provide any information regarding a user interface.

Regarding Column 22, that portion of Smith mentions a user interface 350 (shown in Fig. 10) and states that the user interface "permits a user to select features provided by the application manager 352. The user interface therefore presents to the user a set of selectable operations." Column 22, lines 59-61. The discussion in Smith continues to Column 23, which discusses communication applications 354, offline applications 356, and file manager 360. This discussion fails to provide any specific details regarding the user interface.

Finally, Column 25, lines 3-22, of Smith discloses a display that shows various user options. This portion of Smith mentions that "the user will have the option of choosing an Internet browser, any games that have been loaded on the hard drive 206, and a range of selectable application programs...." Column 25, lines 8-10. Although this portion of Smith mentions options displayed to a user, the cited language does not disclose any further details regarding the user interface. Accordingly, Applicant submits that the portions of Smith cited in the Office Action as supporting disclosure of a user interface fail to disclose the elements of claim 1 of the present application.

In particular, the portions of Smith discussed above fail to disclose a user interface that facilitates access to multiple different media types, such that each of

the multiple different media types has an associated graphical element, as recited in claim 1. A discussion of a user interface that merely provides "options" to a user does not disclose a user interface containing a graphical element associated with each of multiple different media types. Thus, the Smith reference fails to disclose the elements of amended claim 1.

Accordingly, for at least these reasons, Applicant respectfully submits that claim 1 is allowable over Smith. Given that claims 2-12 depend from claim 1, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Additionally, Applicant submits that dependent claim 9 is further allowable over Smith because claim 9 recites a navigation hierarchy having a main menu and multiple collection menus. Smith fails to disclose this type of navigation hierarchy. Accordingly, Applicant submits that claim 9 is further allowable over Smith for these additional reasons.

Claim 13 of the present application, as amended, recites:

> A game console, comprising:
> an integrated hard disk memory that stores instructions required for running games on the game console;
> a processor coupled to the hard disk memory; and
> a console application stored in the hard disk memory and executed on the processor, wherein the console application presents a user interface to facilitate access to multiple different media types and game console settings, and to identify contents of the hard disk drive.

As discussed above with respect to claim 1, although Smith mentions options displayed to a user, the portions of Smith cited in the Office Action fail to disclose

any further details regarding the user interface. In particular, Smith fails to disclose "a user interface to facilitate access to multiple different media types and game console settings, and to identify contents of the hard disk drive" as recited in claim 13.

Accordingly, Smith fails to disclose the elements of claim 13. Thus, for at least these reasons, Applicant respectfully submits that claim 13 is allowable over Smith. Given that claims 16-21 depend from claim 13, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 22 of the present application recites:

A game console, comprising:
a portable memory drive configured to communicate with a portable memory device that stores a first media type, the first media type being one of game media, music media, or movie media;
a memory configured to store a second media type, the second media type being one of game media, music media, or movie media;
a processor coupled to the portable memory drive and the memory; and
a user interface to facilitate user selection of the first and second media types.

Although Smith discusses a game console having an internal memory device, Smith fails to disclose "a portable memory device that stores a first media type", "a memory configured to store a second media type", and "a user interface to facilitate user selection of the first and second media types". Smith fails to disclose any type of portable memory as recited in claim 22. Further, Smith fails to disclose a user interface that allows a user to select between the two different

media types (the media type associated with the portable memory and the media type associated with the other memory).

Accordingly, Smith fails to disclose the elements of claim 22. Thus, for at least these reasons, Applicant respectfully submits that claim 22 is allowable over Smith. Given that claims 23-30 depend from claim 22, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 31 of the present application, as amended, recites:

> A game console, comprising:
> a memory;
> a processor coupled to the memory; and
> a user interface application stored in the memory and executed on the processor to present a main menu for navigating to one of a games area pertaining to gaming media, a music area pertaining to audio media, a movie area pertaining to video media, and a system settings area pertaining to configuration of the game console.

As discussed above with respect to claim 1, although Smith mentions options displayed to a user, the portions of Smith cited in the Office Action fail to disclose any further details regarding the user interface. In particular, Smith fails to disclose a user interface application that permits navigation to a games area, a music area, a movie area, and a system settings area, as recited in claim 31. This combination of user interface features is not disclosed by the Smith reference.

Accordingly, Smith fails to disclose the elements of claim 31. Thus, for at least these reasons, Applicant respectfully submits that claim 31 is allowable over Smith. Given that claims 32-34 depend from claim 31, Applicant respectfully

submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 35 of the present application, as amended, recites:

> A game console, comprising:
> a plurality of memory devices;
> a processor; and
> a user interface application stored in the memory and executed on the processor to present a memory collection menu that identifies the plurality of memory devices that are available for storage of user data.

As discussed above, the Smith reference mentions options displayed to a user. However, the portions of Smith cited in the Office Action fail to disclose any further details regarding the user interface. In particular, Smith fails to disclose a user interface that presents "a memory collection menu that identifies the plurality of memory devices that are available for storage of user data", as recited in claim 35. Smith makes no reference to a user interface capable of displaying a memory collection menu or other menu related to multiple memory devices.

Accordingly, Smith fails to disclose the elements of claim 35. Thus, for at least these reasons, Applicant respectfully submits that claim 35 is allowable over Smith. Given that claims 36-43 depend from claim 35, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 55 of the present application recites:

A method comprising:
presenting a main menu for a game console that identifies different media types that may be played by the game console, the media types including a game media type, a music media type, and a movie media type;
upon selection of the game media type, navigating to a games collection menu that identifies one or more game titles that are currently available to play;
upon selection of the music media type, navigating to a music collection menu that identifies one or more music titles that are currently available to play; and
upon selection of the movie media type, navigating to a movie collection menu that identifies one or more movie titles that are currently available to play.

As discussed above, the Smith reference mentions options displayed to a user. However, the portions of Smith cited in the Office Action fail to disclose any further details regarding the user interface. In particular, Smith fails to disclose "presenting a main menu for a game console that identifies different media types", and navigating to a "games collection menu", a "music collection menu" or a "movie collection menu" depending on a selected media type, as recited in claim 55. Smith makes no reference to a user interface structure of a main menu and multiple sub-menus based on media types.

Accordingly, Smith fails to disclose the elements of claim 55. Thus, for at least these reasons, Applicant respectfully submits that claim 55 is allowable over Smith. Given that claims 56-61 depend from claim 55, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 62 of the present application, as amended, recites:

> A method comprising:
> presenting a memory collection menu that identifies a plurality of memory devices on a game console that are available for storage of user data; and
> upon selection of a memory device, presenting a memory contents menu identifying contents of the selected memory device.

As discussed above, the Smith reference mentions options displayed to a user. However, the portions of Smith cited in the Office Action fail to disclose any further details regarding the user interface. In particular, Smith fails to disclose "presenting a memory collection menu that identifies a plurality of memory devices on a game console that are available for storage of user data; and upon selection of a memory device, presenting a memory contents menu identifying contents of the selected memory device", as recited in claim 62. The Smith reference is silent as to any type of memory collection menu and/or a memory contents menu of the type described in claim 62.

Accordingly, Smith fails to disclose the elements of claim 62. Thus, for at least these reasons, Applicant respectfully submits that claim 62 is allowable over Smith. Given that claims 63-67 depend from claim 62, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Claim 70 of the present application recites:

> A user interface for a game console, comprising:
> a main menu configured to identify different media types that may be played by the game console, the media types including a game media type, a music media type, and a movie media type;
> a games collection menu accessible from the main menu to identify one or more game titles that are currently available to play on the game console;
> a music collection menu accessible from the main menu to identify one or more music titles that are currently available to play on the game console; and
> a movie collection menu accessible from the main menu to identify one or more movie titles that are currently available to play on the game console.

As discussed above, the Smith reference mentions options displayed to a user, but fails to disclose any further details regarding the user interface. In particular, Smith fails to disclose a user interface having "a main menu to identify different media types", " a games collection menu … to identify one or more game titles", "a music collection menu … to identify one or more music titles", and "a movie collection menu … to identify one or more movie titles", as recited in claim 70. The Smith reference fails to disclose this type of menu structure for accessing multiple different media types.

Accordingly, Smith fails to disclose the elements of claim 70. Thus, for at least these reasons, Applicant respectfully submits that claim 70 is allowable over Smith. Given that claims 71-83 depend from claim 70, Applicant respectfully submits that those claims are likewise allowable over Smith for at least the reasons discussed above.

Applicant respectfully requests that the §102 rejections be withdrawn.

Conclusion

Claims 1-13, 16-44, 55-67, and 70-83 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

Date: _7-01-04_   By: _____

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